

## Falcon Refinery Weekly Site Activity Report

February 10, 2012

### February 6, 2012

Today we contacted Gulf –Max and U.S. Ecology to obtain information and confirm the quantities of K-169 hazardous waste that were transported from the Falcon Refinery and disposed of at U.S. Ecology in Robstown, TX. The quantities of K-169 waste disposed of are provided below:

#### 1/30/2012 – 9:41 am

82,180 Gross lb.

36,480 Tare lb.

45,700 Net lb. (22.850 tons) of K-169 hazardous waste;

#### 1/30/2012 – 3:49 am

93,180 Gross lb.

35,540 Tare lb.

56,645 Net lb. (28.320 tons) of K-169 hazardous waste;

#### 1/31/2012 – 3:23 am

66,420 Gross lb.

35,500 Tare lb.

29,920 Net lb. (14.96 tons) of K-169 hazardous waste;

The quantities invoiced to Mr. Bergner are correct and appropriate for three roll-off boxes of waste shipped on 1/30-31/2012. The waste was authorized by Alonzo G. Arredondo, Agent for NORCO and transported by driver for Gulf-Max environmental company from Woodsboro, TX.

Today we requested a price quote from U.S. Ecology for the disposal of a waste that will be generated from the accumulation of chemical constituents by the filtration media on waste water treatment system. The used filtration media could be F037, a listed waste.

We responded to Mr. Bergner's request for assistance with the weekly site progress report that was submitted on February 3, 2012. Mr. Bergner requested that we correct the statement that had been included in the recent weekly report to EPA. He requested that TRC send a correction to EPA on the third bullet of Section 1. The following item has a third sentence that Mr. Bergner says is incorrect. Mr. Bergner says the purchaser of the refinery is not planning to remove the tank, but only the roof. He wants the copy to EPA corrected. Since I do not have the copy that went to Gary I have notified Stephen Halasz. The bullet that has the information to be corrected is provided below:

- Tank 30 – Liquid has been removed. The remainder of sludge will be removed when collapsed roof is removed.

We contacted GAINCO to discuss the rainfall at the site. David Marion traveled to the site and reported that the site is clear. He stated there was some accumulation of water in the low spots in Tank 10 area, but the conditions did not pose any problems.

### February 7, 2012

Today we received and reviewed the proposal for the irrigation system and treatment of wastewater from GAINCO. We reviewed and corrected several items in the proposal – footage of 2” pvc pipe for the distributions laterals within the proposed irrigation fields, etc.

We contacted U.S. Ecology on our request on pricing for the disposal of filtration media from the wastewater treatment project on Tank 26.

We submitted GAINCO’S proposal to TRC’s management for their review.

### **February 8, 2012**

We reviewed and discussed the proposal from GAINCO. We reviewed cost information from U.S. Ecology for the disposal of filtration media as an option for disposal in the event that the filtration material is hazardous. The price for disposal of the filtration media from U.S. Ecology is provided below:

Cost Estimate - For thermal recycling of materials, shipped in Cubic yard Boxes or Bags, the treatment with disposal of residues will be as follows:

Cost will be \$500.00 per CY Box/Bag, plus 10% Energy, Insurance and Recovery Fee. U.S. Ecology’s pricing is based on the client arranging delivery of the materials. If transportation is required, that will be at an additional cost.

We reviewed the TCEQ letter approving the treatment of wastewater and land application to determine if the proposal included cost items that addressed the scope of the TCEQ’s requirements.

### **February 9, 2012**

Today we contacted GAINCO to check on the weather conditions in Portland, TX. We reviewed the TCEQ approval letter and prepared a checklist to meet the TCEQ requirements.

### **February 10, 2012**

We also prepared and submitted the weekly report for the removal action activities at the Falcon Refinery to EPA.

Today we communicated with TestAmerica to evaluate whether they could meet the analytical requirements included in the TCEQ’s approval letter (for the annual composite soil sampling of the irrigation fields).

### **Outstanding Issues / Plans for Next Week (February 13 – 17, 2012)**

**Setup of Treatment System and Construction of Irrigation Field** – Upon receiving authorization to proceed, we will complete the setup of the treatment system in 7 days. The construction of the irrigation fields can be completed in 14 to 21 days, depending on immediate availability of supplies and equipment.

**Demolition of Tank 7** – We have recommended that this tank be demolished to facilitate the removal of the internal floating roof and removal of the paraffin sludge.

**Demolition of Tank 30** – The contractor had entered into an agreement with NORCO to demolish Tank 30. This effort was postponed January 4, 2012 pending the sale of the facility.

**Demolition of Section 1A of Process Area No. 1** – A proposal for the demolition of a section of the former refinery has been submitted to the client and it has been approved. The area is the small easternmost section of Process Area No. 1 (we'll call Section 1A). This section is the unit that is directly west of the former location of Tanks 19 and 20, and south of Tanks N1 and N2. This effort was postponed January 12, 2012 pending the sale of the facility.

**Tanks 10 and 27 Fiberglass Insulation** - We have submitted a Cost Estimate for House Keeping in the areas of Tank 27 and Tank 10. There is considerable amount of fiberglass insulation that must be disposed of before the plastic bags that were used to contain most of the insulation began to deteriorate in the weather. The fiberglass insulation will be classified as Class II non-hazardous waste. We have yet to receive authorization to load and dispose of the insulation.

**Small Tanks Area – Disposal of Fiberglass Insulation from Tanks 20 and 24** - We have submitted a proposal to the client for authorization to act as an agent for the generator in the disposition of the fiberglass material at BFI's El Centro Facility in Robstown, TX. The insulation has been classified as Class II non-hazardous waste. Norco has requested that we begin making arrangement for the disposal of waste material at BFI. We contacted BFI on January 5, 2012 and have arranged for the payment and disposition of the class II non-hazardous waste material. On January 20 and 30, 2012 we resubmitted the cost information to Mr. Bergner for the disposal of the waste. BFI informed us on 1/26/2012 that no prepayment for disposal has been received from Mr. Bergner. We have yet to receive authorization to transport and dispose of the insulation.

**Disposal of Large Aluminum Roof Material via Macro-Encapsulation** - We have been notified by U.S. Ecology that heavily contaminated aluminum material cannot be treated by thermal desorption because the aluminum pieces are too large to be transferred by the auger conveyor into an incinerator. The approved alternative they have recommended is to emplace the material into a 25 cu yd. bag for disposal into the landfill. The material must be emplaced into a bag at the Falcon Refinery site then transferred to U.S. Ecology's site for inspection and disposal. The total quantities of material are yet to be determined.